

St. Louis County (HW)
Scientific Associates, Inc.

RECEIVED
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STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Met Carhill, Governor David A. Shorr, Director

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office
10805 Sunset Office Drive, Suite 100 St. Louis, MO 63127-1017
(314)822-0101
FAX (314)822-0943

January 18, 1996

CERTIFIED MAIL #Z 033 652 199
RETURN RECEIPT REQUESTED

Mr. Peter J. Renaud, President
Scientific Associates, Incorporated
6200 South Lindbergh Boulevard
St. Louis, MO 63123

RECEIVED
JAN 24 1996

HAZARDOUS WASTE PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES

Dear Mr. Renaud:

LOW #96-SL.003

This Letter of Warning is resultant of a hazardous waste management inspection conducted on January 8, 1996, by Mr. Thomas Sims of my staff at Scientific Associates, Incorporated (SAI) at 6200 South Lindbergh Boulevard, St. Louis, Missouri. This inspection was conducted as a regional office initiative under the authority of the Resource Conservation and Recovery Act of 1976 (RCRA) and Subsection 260.375(9) and Section 260.377 of the Missouri Hazardous Waste Management Law.

Please review the enclosed Inspection Record and Checklist completed by Mr. Sims as a part of the inspection. The citations circled on the checklist indicate items of non-compliance found during the inspection. The violations observed, which resulted in the citations, are explained in the "Comments" section of the checklist.

In order to return the facility to compliance, the following is required:

1. Clearly mark each satellite accumulation container with the beginning date of hazardous waste accumulation.

SAI must certify that each satellite container was marked with the beginning date of accumulation and that all future containers will be marked as required.

2. Post the emergency coordinator's name and telephone number; the locations of spill-control equipment, fire alarm(s), and fire-control equipment; and the fire department's telephone number near the telephone(s) available to personnel handling hazardous waste.

SAI must certify that the required information is posted and updated as necessary.



R00025244
RCRA Records Center



Include a facility sketch to show the location(s) where the information is posted and a copy of the information with the certification.

3. Enter the Missouri Manifest Document Number (the facility's Missouri Generator's Identification Number followed by a consecutive shipment number), the license plate number and state of registration of the waste-carrying portion of the vehicle, and the specific gravity of each waste listed with total quantity specified volumetrically (gallons, liters, cubic yards, and cubic meters) on future Hazardous Waste Manifests.

SAI must certify that the information specified above and other required Missouri information specified in Paragraph 10 CSR 25-5.262(2)(B)2 of the Missouri Hazardous Waste Management Regulations will be entered on future manifests.

Please respond to this Letter of Warning in writing by February 15, 1996. Include certifications and materials as specified above with the response. Direct the response and any questions you may have to Mr. Sims at this office, and copy the response to Ms. Kathy Flippin, Chief, Enforcement Unit, Hazardous Waste Program, P.O. Box 176, Jefferson City, Missouri 65102.

Sincerely,

ST. LOUIS REGIONAL OFFICE



Robert S. P. Eck
Regional Director


RSPE:TWS:mc

Enclosures

✓ e. HWP



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
SMALL QUANTITY GENERATOR
INSPECTION RECORD AND CHECKLIST

RECEIVED
REGIONAL OFFICE
JAN 24 1996
INITIALS
SOG-INSP

ONLY FOR FACILITIES THAT GENERATE/ACCUMULATE < 1000 Kg (2,200 lbs. or approximately 15 cubic yards) of hazardous waste

NAME <i>Scientific Associates, Inc. (SAI)</i>		DATE <i>1-8-96</i>	HAZARDOUS WASTE PROGRAM MISSOURI DEPARTMENT OF NATURAL RESOURCES <i>MO0005261806.3</i>
ADDRESS <i>6200 S. Lindbergh Blvd.</i>		RR NO. <i>NA</i>	MO.I.D. NUMBER <i>002156</i>
CITY <i>St. Louis</i>	NUMBER OF EMPLOYEES <i>~ 100</i>	YEARS AT SITE	TELEPHONE NUMBER (314) <i>487-6776</i>
FACILITY REPRESENTATIVE(S), TITLE(S) <i>Mr. Dennis P. Fleming, Director of Compliance ; Mr. Bill Lake, Manager of Quality Assurance</i>			

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT

SAI is a chemical, biological, microbiological, and toxicological contract testing laboratory that mainly provides quality control and assurance testing of raw materials and finished products for various chemical, pharmaceutical, agricultural, and other industries. SAI also provides other services such analytical method development, analyses of compliance-monitoring samples, and consultation and support in the registration and approval of new products. SAI utilizes various analytical methods, including in-vitro and in-vivo (with rodents) techniques and instrumentation such as IR and UV/Vis Spectrophotometry, HPLC, GC, TLC/PC, AA, and GC/MS and various "wet" methods.

WASTE STREAMS

DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
<i>Waste Flammable liquid - waste solvents from sample preparations and extractions, laboratory equipment cleaning, and instrumentation (Ex: purge and sample-carrier solvents from HPLC), Methanol, Ethanol, Hexane, Toluene, Acetonitrile, Chloroform (D022), and Methylene Chloride are solvents included in this waste stream.</i>	<i>~ 35gal./mo.</i>	<i>D001</i>	<i>CWM - Chemical Services, Inc. Millington, TN TN0000772186</i>
<i>Various "one-time" generations of expired-dated reagents and other materials and samples found hazardous. Samples found hazardous usually returned to the facility that submitted the samples</i>	<i>less than 100kg/yr.</i>	<i>Various</i>	<i>Controlled Waste Division Menomonee Falls, WI WI0003967148</i>
<i>3. special waste: Pharmaceutical Waste and Medical Waste - handled and transported under BFI - incinerated and landfilled</i>	<i>—</i>	<i>NA</i>	<i>—</i>

CHECK ALL THAT APPLY (Specify if possible)

<input type="checkbox"/> NPDES Permit	<input type="checkbox"/> Lead/Acid Batteries	<input type="checkbox"/> POTW <i>MSP</i>
<input type="checkbox"/> Septic Tank	<input type="checkbox"/> H.W. Burner/Blender/Marketer	<input type="checkbox"/> Solid Waste Landfill
<input type="checkbox"/> Air Permit	<input type="checkbox"/> Precious Metal Reclamation	<input type="checkbox"/> Waste Water Pretreatment

A. GENERAL			COMMENTS
1	<input checked="" type="checkbox"/> Registered as a HW Generator - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262 (2)(A)	GGR	
2	<input checked="" type="checkbox"/> Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11	GGR	
3	<input checked="" type="checkbox"/> Utilizes a licensed hazardous waste transporter - Section 260.380.1 (5) RSMo	GGR	
4	<input checked="" type="checkbox"/> Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo	GGR	
5	<input checked="" type="checkbox"/> Facility does not operate as a TSD - Section 260.390(1) RSMo	GGR	

Chemical Waste Management, Inc., H-16-10

PART 1: WALK-THROUGH INSPECTION

B. PRE-TRANSPORT CONTAINERIZATION & STORAGE			COMMENTS
1	<input checked="" type="checkbox"/> Storage does not exceed 180 days (270 days if transported > 200 miles) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(e)	GSQ	
2	<input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.171	GPT	
3	<input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.172	GPT	
4	<input checked="" type="checkbox"/> Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.173(a)	GPT	
5	<input checked="" type="checkbox"/> Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.177(c)	GPT	
6	<input checked="" type="checkbox"/> Containers of ignitable or reactive waste stored > 50 ft. from property line (or meet requirements) - 10 CSR 25-5.262 (2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265 (2)(I)3.	GOR	
7	<input checked="" type="checkbox"/> Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262 (2)(C)1.	GOR	
8	<input checked="" type="checkbox"/> Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2)	GPT	
9	<input checked="" type="checkbox"/> Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.B.(II)	GOR	
10	<input checked="" type="checkbox"/> Containers clearly marked "hazardous waste" - 10 CSR 25-5.262(I) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3)	GPT	
11	<input checked="" type="checkbox"/> Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.A.(II)	GPT	
12	<input checked="" type="checkbox"/> Daily inspection of areas subject to spills, ie. waste handling areas - 10 CSR 25-5.262(2)(C)2.A.(II)	GOR	
13	<input type="checkbox"/> Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.35 <i>NA</i>	GPT	
14	<input checked="" type="checkbox"/> Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33	GPT	
15	<input checked="" type="checkbox"/> "No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.D.(II)	GOR	
16	<input checked="" type="checkbox"/> Waste oil containers in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR	

One 55-gallon drum and three 35-gallon drums all full, except for one of the 35-gallon drums was approximately 2/3 full of ignitable waste (waste stream #1) located in the storage area at the east end of the property near the outside wall of Bldg. C.

C. SATELLITE ACCUMULATION			COMMENTS
1	<input checked="" type="checkbox"/> Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173	GPT	
2	<input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171	GPT	
3	<input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172	GPT	
4	<input checked="" type="checkbox"/> Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)	GPT	
5	<input checked="" type="checkbox"/> Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)3.	GPT	
6	<input type="checkbox"/> Container marked identifying contents & beginning date - 10 CSR 25-5.262(2)(C)3.	GOR	<i>Above satellite containers not marked with beginning date of accumulation.</i>

Several one-gallon glass jugs accumulating waste solvents placed in exhaust hood's of the Chemistry Dept. located in Bldg. F. The containers are emptied into a drum located in storage area behind Bldg. C once per week. Waste stream #1

7. <input checked="" type="checkbox"/> Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.	GOR	COMMENTS
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D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES		
1. <input checked="" type="checkbox"/> Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.31	GPT	COMMENTS <i>Information not posted at telephones available to personnel handling hazardous waste in Buildings A or C</i>
2. <input checked="" type="checkbox"/> Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) and properly tested and maintained - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34 (d)(4) referencing 40 CFR 265 Subpart C.	GPT	
3. <input checked="" type="checkbox"/> Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(d)	GPT	
4. <input checked="" type="checkbox"/> Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.33	GPT	
5. <input type="checkbox"/> Emergency coordinator's name and phone number posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
6. <input type="checkbox"/> Telephone number of fire department posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
7. <input type="checkbox"/> Location of fire extinguisher and spill control equipment posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
8. <input checked="" type="checkbox"/> Employees familiar with waste handling and emergency procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(iii)	GSQ	
9. <input checked="" type="checkbox"/> Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)	GPT	
10. <input checked="" type="checkbox"/> Telephone or two-way radio onsite and capable of summoning local fire or police dept. - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(b)	GPT	

E. SQG TANKS				
TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1. NA				
2.				
3.				

1. <input type="checkbox"/> Uncovered tanks have 2 ft. freeboard or containment system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(3)	GPT	COMMENTS
2. <input type="checkbox"/> Continuously fed tanks equipped with a feed cut-off system or a proper by-pass system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(4)	GPT	
3. <input type="checkbox"/> Waste and/or treatment method is compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(2)	GPT	
4. <input type="checkbox"/> Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(f)	GPT	
5. <input type="checkbox"/> Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(1)	GPT	
6. <input type="checkbox"/> Ignitable or reactive wastes in covered tanks treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(2)	GPT	
7. <input type="checkbox"/> Volatiles with vapor pressure > 78 mm Hg @ 25° C not placed in open tanks - 10 CSR 25-5.262(2)(C)2.D.(i)	GOR	
8. <input type="checkbox"/> Wastes and residues removed from tank and equipment, and handled properly upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(d)	GPT	
9. <input type="checkbox"/> Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3)	GPT	

10. <input type="checkbox"/> Inspection of waste feed cut off, bypass system, monitoring data and freeboard each operating day - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)	GPT	COMMENTS
11. <input type="checkbox"/> Weekly inspection of confinement structure, construction materials and general area for leaks, corrosion or discharges - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)5	GPT	
12. <input type="checkbox"/> Waste oil tanks in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR	

PART 2: RECORDS INSPECTION

F. MANIFESTS

1. <input checked="" type="checkbox"/> Facility uses manifest system or wastes reclaimed under contractual agreement - 260.380.1(6) RSMo, and 10 CSR 25-5.262(2)(B)	GMR	COMMENTS
2. <input type="checkbox"/> Generator maintains a copy of the contractual agreement on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(e)(2)	GMR	
3. <input checked="" type="checkbox"/> Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)	GRR	
4. <input checked="" type="checkbox"/> Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(2)(B)	GOR	
5. <input checked="" type="checkbox"/> Manifest document, ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A	GOR	
6. <input checked="" type="checkbox"/> Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)1.	GMR	
7. <input checked="" type="checkbox"/> All transporters' names, phone numbers, license plate #s, MO & EPA I.D.#s - 10 CSR 25-5.262(2)(B)2.	GMR	
8. <input checked="" type="checkbox"/> Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)1.	GMR	
9. <input checked="" type="checkbox"/> DOT shipping name, Hazard Class and waste I.D. # (RQ - if required) - 10 CSR 25-5.262(2)(B)2.	GMR	
10. <input checked="" type="checkbox"/> Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)2.	GMR	
11. <input checked="" type="checkbox"/> Manifest signed and dated - 10 CSR 25-5.262(2)(B)1.	GMR	
12. <input checked="" type="checkbox"/> Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A	GOR	
13. <input checked="" type="checkbox"/> Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1	GOR	
14. <input checked="" type="checkbox"/> Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C	GRR	
15. <input checked="" type="checkbox"/> Summary Manifest Reports and manifest copies sent to DNR quarterly - 10 CSR 25-5.262(2)(D)1	GOR	
16. <input checked="" type="checkbox"/> Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
17. <input checked="" type="checkbox"/> "Land-Ban" notification/certification sent with manifests or with 1st shipment under a tolling agreement & retained on-site for 5 years - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
18. <input checked="" type="checkbox"/> Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	

G. PREPAREDNESS AND PREVENTION

1. <input checked="" type="checkbox"/> Arrangements with local emergency agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37	GPT	COMMENTS
2. <input checked="" type="checkbox"/> Emergency coordinator(s) on premise or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(i)	GSQ	

H. WASTE OIL

1. <input checked="" type="checkbox"/> Waste oil is managed properly and not disposed of into the environment - 10 CSR 25-11.010(1)(D)	GOR	COMMENTS
2. <input checked="" type="checkbox"/> Listed hazardous waste mixed with waste oil is handled as a hazardous waste - 10 CSR 25-11.010(1)(C)2.	GOR	
3. <input checked="" type="checkbox"/> Registered as waste oil generator if gen./accum. 220 lb. - 10 CSR 25-11.010(2)(A)	GOR	
4. <input checked="" type="checkbox"/> Written waste oil contract maintained - 10 CSR 25-11.010(4)(C)	GOR	
5. <input checked="" type="checkbox"/> Uses a licensed transporter and receiving facility - 10 CSR 25-11.010(4)	GOR	

RESOURCE RECOVERY

1. <input type="checkbox"/> RR certification for energy recovery or reclamation of waste, oil or hazardous waste on-site - 10 CSR 25-9.020(1)(A)3.	GOR
2. <input type="checkbox"/> Still bottoms or RR residues disposed of properly - Section 260.380.1(5) RSMo.	GOR
3. <input type="checkbox"/> Facility is classified as U, R1, or R2 accurately - 10 CSR 25-9.020(3)(A).	GOR
4. <input type="checkbox"/> Facility meets the operating conditions of certification - 10 CSR 25-9.020(3).	GOR
5. <input type="checkbox"/> Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E)1 and 2.	GOR
6. <input type="checkbox"/> Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.	GOR
7. <input type="checkbox"/> Facility maintains a complete written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) and (2) as modified by 10 CSR 25-7.264(2)(E)2.	GOR
8. <input type="checkbox"/> Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.	GOR

COMMENTS

CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

Encl: manifests and LDR
facility sketch

INSPECTOR'S SIGNATURE

DATE